

1 JOHN T. BELL (SBN 209941)  
2 **LAW OFFICES OF JOHN T. BELL**  
610 – 16<sup>th</sup> Street, Suite 421  
3 Oakland, CA 94612  
Telephone: 510.444.4638  
4 Facsimile: 510.444.4019

5 Attorney for Plaintiff  
JAMES BROWN

6 STEPHEN M. HAYES (SBN 83583)  
7 STEPHEN P. ELLINGSON (SBN 136505)  
JAMIE A. RADACK (SBN 221000)  
8 **HAYES DAVIS BONINO ELLINGSON McLAY & SCOTT, LLP**  
203 Redwood Shores Pkwy., Suite 480  
9 Redwood City, CA 94065  
Telephone: 650.637-9100  
10 Facsimile: 650.637-8071

11 Attorney for Defendant  
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY  
12  
UNITED STATES DISTRICT COURT  
13  
NORTHERN DISTRICT OF CALIFORNIA

14 JAMES BROWN,

15 Plaintiff,

16 v.

17 STATE FARM MUTUAL AUTOMOBILE  
18 INSURANCE COMPANY; and DOES 1  
through 25, inclusive,

19 Defendants.  
20

CASE NO. C07-02743 PJH

**THE PARTIES' JOINT STIPULATED  
ADMINISTRATIVE MOTION TO  
CONTINUE THE DISPOSITIVE  
MOTION DEADLINE**

21  
22 The parties to the above-entitled action hereby respectfully submit their Joint Stipulated  
23 Administrative Motion to Continue the Deadline to Hear Dispositive Motions pursuant to Judge  
24 Hamilton's Pretrial Instructions and Civil L.R. 7-11.

25 1. The parties have been working diligently toward moving this case forward in an  
26 efficient, expeditious manner and have exchanged written discovery and responses and commenced  
27 deposition discovery;

28 2. The parties previously stipulated to continue the deadline to hear dispositive

1 motions, which the Court granted, in order to allow plaintiff to take certain depositions;

2 5. Plaintiff has identified five additional depositions of State Farm representatives. The  
3 parties are cooperating in an attempt to schedule those depositions on mutually available dates.  
4 However, given the parties' and counsels' current schedules, they do not anticipate being able to  
5 complete those depositions before the current deadline to hear dispositive motions, which is July  
6 30, 2008;

7 6. State Farm is prepared to file a motion for summary judgment pursuant to the current  
8 deadline. However, plaintiff has requested a continuance in order to complete the additional  
9 depositions before State Farm files its motion for summary judgment.

10 7. Therefore, the parties hereby jointly stipulate to and request that the Court extend the  
11 deadline to hear dispositive motions to October 1, 2008.

12  
13 Dated: Jun 11, 2008

LAW OFFICES OF JOHN T. BELL

14  
15 By John T. Bell  
16 JOHN T. BELL  
17 Attorneys for Plaintiff  
JAMES BROWN

18 Dated: \_\_\_\_\_, 2008

HAYES DAVIS BONINO ELLINGSON  
McLAY & SCOTT, LLP

19  
20  
21 By \_\_\_\_\_  
22 STEPHEN M. HAYES  
23 STEPHEN P. ELLINGSON  
24 JAMIE A. RADACK  
25 Attorneys for Defendant  
26 STATE FARM MUTUAL AUTOMOBILE  
27 INSURANCE COMPANY  
28

1 motions, which the Court granted, in order to allow plaintiff to take certain depositions;

2 5. Plaintiff has identified five additional depositions of State Farm representatives. The  
3 parties are cooperating in an attempt to schedule those depositions on mutually available dates.  
4 However, given the parties' and counsels' current schedules, they do not anticipate being able to  
5 complete those depositions before the current deadline to hear dispositive motions, which is July  
6 30, 2008;

7 6. State Farm is prepared to file a motion for summary judgment pursuant to the current  
8 deadline. However, plaintiff has requested a continuance in order to complete the additional  
9 depositions before State Farm files its motion for summary judgment.

10 7. Therefore, the parties hereby jointly stipulate to and request that the Court extend the  
11 deadline to hear dispositive motions to October 1, 2008.

12  
13 Dated: \_\_\_\_\_, 2008

LAW OFFICES OF JOHN T. BELL

14  
15 By \_\_\_\_\_

16 JOHN T. BELL  
Attorneys for Plaintiff  
JAMES BROWN

17  
18 Dated: 6/12, 2008

HAYES DAVIS BONINO ELLINGSON  
McLAY & SCOTT, LLP

19  
20 By  \_\_\_\_\_

21 STEPHEN M. HAYES  
22 STEPHEN P. ELLINGSON  
23 JAMIE A. RADACK  
Attorneys for Defendant  
24 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY  
25  
26  
27  
28

**[PROPOSED] ORDER**

IT IS SO ORDERED:

Pursuant to the joint motion of the parties, the deadline to hear dispositive motions shall be continued to October 1, 2008.

Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
HONORABLE PHYLLIS HAMILTON  
UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF  
CALIFORNIA